## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

TRUTEK CORP.,

Plaintiff,

v.

**Document Electronically Filed** 

Civil Action No.: 2:23– cv-3709

YEONG WAN CHO (a.k.a. PETER CHO, ET AL.,

Defendants.

## JOINT LETTER REQUESTING ENTRY OF PROPOSED AMENDED PRETRIAL SCHEDULING ORDER

Plaintiff Trutek Corp. and all defendants that have been made parties to this action, Defendants Salvacion, USA, Inc., Salvacion Co., LTD., Yeong Wan Cho (aka Peter Cho), Salvacion International, LLC, and Biosure Global, Ltd. hereby present this Joint Letter requesting entry of the attached proposed amended pretrial scheduling order as follows:

- 1. This matter came before the Court for a scheduling conference pursuant to Rule 16 of the Federal Rules of Civil Procedure on December 1, 2023.
  - 2. That same day, the Court entered the Pretrial Scheduling Order. Doc. 55.
- 3. Paragraph 23 of the Pretrial Scheduling Order provides that "there will be no extensions except for good cause shown and by leave of Court, even with consent of all counsel." Doc. 55.
- 4. The parties consent and for good cause shown request a 30 day extension of all deadlines in Paragraphs 6 through 17 of the Pretrial Scheduling Order.
- 5. The parties stipulate that good cause is shown for all parties. The parties' counsel prefer not to detail the underlying details of good cause in the public record, some of which include

medical needs. That said, the parties will make themselves available for a telephonic conference with the Court upon request.

- 6. Entry of the Proposed Amended Pretrial Scheduling Order will not prejudice any party or the original discovery deadline.
  - 7. Defendants' Counsel has authorized undersigned to submit this letter jointly.

Respectfully submitted, this the 27th day of February, 2024.

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